

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JEROME BARROW

Plaintiff,

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CITY OF CLEVELAND, ET AL.,

Defendants.

CASE NO. 1:16-CV-00923

JUDGE DONALD C. NUGENT

AFFIDAVIT OF STEPHEN W. FUNK IN SUPPORT OF
DEFENDANTS' MOTION FOR ATTORNEY FEES

I, Stephen W. Funk, having been duly cautioned and sworn, hereby declare and state as follows:

1. I am an attorney at the law firm of Roetzel & Andress, LPA in Cleveland and Akron, Ohio. I have been an attorney for over twenty-five (25) years since May 1992. In this capacity, I have over 25 years of civil litigation experience, including significant experience in defending civil rights cases in federal court.

2. I have reviewed Defendants' Motion for Attorney Fees and Costs in the above-referenced matter. Based upon my experience in civil litigation in the Northern District of Ohio, it is my professional opinion that the hours and rates set forth in Defendants' Motion for Attorney Fees and Costs are reasonable, given the experience of the attorneys, the nature and scope of the alleged claims, and the number of Defendants being represented.

3. The fact that the City of Cleveland used three attorneys to prepare for and defend the trial in this case was reasonable under the circumstances, given the volume of work required for a federal court jury trial, the number of claims at issue, the number of Defendants, and the broad scope of the allegations made by the Plaintiff.

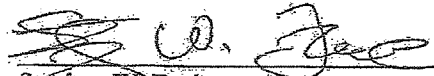
EXHIBIT

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4. The hourly rate of \$300/hour is reasonable and does not exceed the prevailing market rates for the senior attorneys in the Northern District of Ohio who have between eight and fifteen years of experience, such as Michael Pike, Stacey Pellom, and Aikaterini Houston. The hourly rate of \$150/hour is reasonable and does not exceed the prevailing market rates for a first-year attorney, such as Brandon Brown.

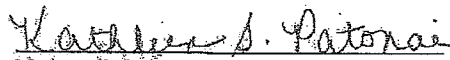
Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of February, 2018.


Stephen W. Funk

SIGNED AND SWORN BEFORE ME ON THIS 21st DAY OF FEBRUARY, 2018.



KATHLEEN S. PATONAI, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires August 3, 2019


Kathleen S. Patonai
Notary Public